

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

JODIE LOVE,

Plaintiff,

v.

VIRGINIA PORT AUTHORITY,

Defendant.

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CASE NO.: 2:16-CV-160

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF**

COMES NOW Plaintiff, Jodie Love, by counsel, pursuant to Rule 6(b)(1)(A), Federal Rules of Civil Procedure, and hereby moves this Court for an extension to file her Reply Brief to the Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint filed by Defendant Virginia Port Authority, and in support of same states as follows:

1. On December 28, 2016 Defendant filed its Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint.

2. Plaintiff's Reply Brief to Defendant's Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint is due January 3, 2017. However, counsel for Defendant is away from the office on vacation and not scheduled to return to the office prior to the due date for the Reply Brief.

3. Plaintiff requests an extension of time until January 6, 2017, to file her Reply Brief to the Defendant's Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint.

4. Counsel for the Defendant has been consulted and has no objection to the requested extension.

WHEREFORE, the Plaintiff moves this Court for an extension of time to file a Reply Brief to the Response in Opposition to Plaintiff's Motion for Leave to File Amended Complaint through January 6, 2017.

Respectfully Submitted,

JODIE LOVE

/s/
Gregory William Klein, Esquire

Gregory William Klein, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of January, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send electronic notification of such filing (NEF) to the following counsel of record:

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